

1 THE HONORABLE BENJAMIN H. SETTLE  
 2  
 3  
 4  
 5  
 6

7 UNITED STATES DISTRICT COURT  
 8 WESTERN DISTRICT OF WASHINGTON  
 9 AT SEATTLE

10 COMMANDER EMILY SHILLING, et al.,

11 Plaintiffs,

12 v.

13 DONALD J. TRUMP, in his official capacity as  
 14 President of the United States; et al.,

15 Defendants.

16 No. 2:25-cv-241-BHS

17 STIPULATED MOTION FOR LEAVE  
 18 TO FILE OVERLENGTH BRIEFS

19 NOTE ON MOTION CALENDAR:  
 20 FEBRUARY 18, 2025

21 The Parties, by and through their undersigned counsel, hereby respectfully request an  
 22 order permitting them to file overlength briefs regarding Plaintiffs' forthcoming Motion for  
 23 Preliminary Injunction. This stipulated motion is brought pursuant to Local Rules W.D. Wash.  
 24 LCR 7(f) and is noted for same day consideration pursuant to Local Rules W.D. Wash. LCR  
 25 7(d)(1).

26 Pursuant to the Local Civil Rules, "motions for preliminary injunction... and briefs in  
 opposition shall not exceed 8,400 words, [and] [r]eply briefs shall not exceed 4,200 words."  
 Local Rules W.D. Wash. LCR 7(e)(3). The Rules provide that page limit and word count  
 requirements may only be exceeded by court order or rule. *See* Local Rules W.D. Wash. LCR  
 7(e), (f).

27 The Parties request leave to file overlength preliminary injunction briefing as follows:

- 28 • 10,000 words for the Motion;

29 STIPULATED MOTION TO  
 30 FILE OVERLENGTH BRIEFS  
 31 CASE NO. 2:25-CV-241-BHS

32 Perkins Coie LLP  
 33 1201 Third Avenue, Suite 4900  
 34 Seattle, Washington 98101-3099  
 35 Phone: 206.359.8000  
 36 Fax: 206.359.9000

37 Lambda Legal Defense and  
 38 Education Fund, Inc.  
 39 120 Wall Street, 19th Floor  
 40 New York, NY. 10005-3919  
 41 Telephone: 212-809-8585

42 Human Rights Campaign  
 43 Foundation  
 44 1640 Rhode Island Avenue NW  
 45 Washington, D.C. 20036  
 46 Telephone: (202) 568-5762

- 1       • 10,000 words for the Opposition Brief;  
2       • 5,000 words for the Reply Brief.

3           The Parties agree that an order increasing the word count is necessary due to the  
4 complexity of the matters raised in Plaintiffs' Complaint, which involves eight plaintiffs, ten  
5 defendants, four causes of action, and raises multiple issues of constitutional law.

6           It is so stipulated, by and between the Parties.

7           Pursuant to Local Rules W.D. Wash. LCR 7(e)(6), I certify that this memorandum  
8 contains 192 words, in compliance with the Local Civil Rules.

9  
10          DATED this 18<sup>th</sup> day of February 2025.

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

STIPULATION TO FILE  
OVERLENGTH BRIEFS - 2  
CASE NO. 2:25-CV-241-BHS

Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, Washington 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

Lambda Legal Defense and  
Education Fund, Inc.  
120 Wall Street, 19th Floor  
New York, NY. 10005-3919  
Telephone: 212-809-8585

Human Rights Campaign  
Foundation  
1640 Rhode Island Avenue NW  
Washington, D.C. 20036  
Telephone: (202) 568-5762

1 *Stipulated and Agreed by:*

2 By: s/ Matthew P. Gordon  
 Matthew P. Gordon, WSBA No. 41128  
 Abdul Kallon, WSBA No. 60719  
**Perkins Coie LLP**  
 1201 Third Avenue, Suite 4900  
 Seattle, Washington 98101-3099  
 Telephone: 206.359.8000  
 Facsimile: 206.359.9000  
 E-mail: [MGordon@perkinscoie.com](mailto:MGordon@perkinscoie.com)  
 E-mail: [AKallon@perkinscoie.com](mailto:AKallon@perkinscoie.com)

Danielle Sivalingam (*pro hac vice*)  
**Perkins Coie LLP**  
 505 Howard Street, Suite 1000  
 San Francisco, CA 94105-3204  
 Telephone: 415.344.7000  
 Facsimile: 415.344.7050  
 E-mail: [DSivalingam@perkinscoie.com](mailto:DSivalingam@perkinscoie.com)

Mary Grace Thurmon (*pro hac vice*)  
 Bo Yan Moran (*pro hac vice*)  
**Perkins Coie LLP**  
 3150 Porter Drive  
 Palo Alto, CA 94304-1212  
 Telephone: 650.838.4300  
 Facsimile: 650.838.4350  
 E-mail: [MThurmon@perkinscoie.com](mailto:MThurmon@perkinscoie.com)  
 E-mail: [BMoran@perkinscoie.com](mailto:BMoran@perkinscoie.com)

Gabriella Romanos Abihabib (*pro hac vice*)  
**Perkins Coie LLP**  
 1155 Avenue of the Americas, 22nd  
 Floor  
 New York, NY 10036-2711  
 Telephone: 212.262.6900  
 Facsimile: 212.977.1649  
 E-mail: [GRomanos@perkinscoie.com](mailto:GRomanos@perkinscoie.com)

21 *Attorneys for Plaintiffs*

Sasha Buchert (*pro hac vice*)  
**Lambda Legal Defense and  
 Education Fund, Inc.**  
 815 16th St. NW, Suite 4140  
 Washington, DC 20006  
 Telephone: 202.804.6245  
 Facsimile: 855.535.2236  
 E-mail: [SBuchert@lambdalegal.org](mailto:SBuchert@lambdalegal.org)

By: s/ John Robinson

BRETT A. SHUMATE  
 Acting Assistant Attorney General

ALEXANDER K. HAAS  
 Director, Federal Programs Branch

JEAN LIN  
 Special Litigation Counsel

JASON C. LYNCH  
 JOHN ROBINSON  
 ELIZABETH B. LAYENDECKER  
 Trial Attorneys  
 United States Department of Justice  
 Civil Division, Federal Programs  
 Branch  
 1100 L Street NW  
 Washington, DC 20005  
 Telephone: 202.616.8489  
 Facsimile: 202.514.1359  
 Jean.Lin@usdoj.gov  
 Jason.Lynch@usdoj.gov  
 John.J.Robinson@usdoj.gov  
 Elizabeth.B.Layendecker@usdoj.gov

22 *Attorneys for Defendants*

1 Jennifer C. Pizer (*pro hac vice*)  
 2 **Lambda Legal Defense and**  
 3 **Education Fund, Inc.**  
 4 800 South Figueroa Street, Suite 1260  
 5 Los Angeles, CA 90017  
 6 Telephone: 213.382.7600  
 7 Facsimile: 855.535.2236  
 8 E-mail: [JPizer@lambdalegal.org](mailto:JPizer@lambdalegal.org)

9 Camilla B. Taylor (*pro hac vice*)  
 10 Kenneth Dale Upton, Jr. (*pro hac vice*)  
 11 **Lambda Legal Defense and**  
 12 **Education Fund, Inc.**  
 13 3656 N Halsted St.  
 14 Chicago, IL 60613  
 15 Telephone: 312.663.4413  
 16 Facsimile: 855.535.2236  
 17 E-mail: [CTaylor@lambdalegal.org](mailto:CTaylor@lambdalegal.org)  
 18 E-mail: [KUpton@lambdalegal.org](mailto:KUpton@lambdalegal.org)

19 Omar Gonzalez-Pagan (*pro hac vice*)  
 20 **Lambda Legal Defense and**  
 21 **Education Fund, Inc.**  
 22 120 Wall Street, 19th Floor  
 23 New York, NY. 10005-3919  
 24 Telephone: 212.809.8585  
 25 Facsimile: 855.535.2236  
 26 E-mail: [OGonzalez-Pagan@lambdalegal.org](mailto:OGonzalez-Pagan@lambdalegal.org)

1 Kell Olson (*pro hac vice*)  
 2 **Lambda Legal Defense and**  
 3 **Education Fund, Inc.**  
 4 3849 E Broadway Blvd, #136  
 5 Tucson, AZ 85716  
 6 Telephone: 323.370.6915  
 7 Facsimile: 855.535.2236  
 8 E-mail: [KOlson@lambdalegal.org](mailto:KOlson@lambdalegal.org)

9 *Attorneys for Plaintiffs*

10 Sarah Warbelow (*pro hac vice*)  
 11 Cynthia Weaver (*pro hac vice*)  
 12 Ami Patel (*pro hac vice*)  
 13 **Human Rights Campaign**  
 14 **Foundation**  
 15 1640 Rhode Island Ave. N.W.  
 16 Washington, DC 20036  
 17 Telephone: 202.527.3669  
 18 Facsimile: 202.347.5323  
 19 E-mail: [Sarah.Warbelow@hrc.org](mailto:Sarah.Warbelow@hrc.org)

20 STIPULATION TO FILE  
 21 OVERLENGTH BRIEFS - 4  
 22 CASE NO. 2:25-CV-241-BHS

23 Perkins Coie LLP  
 24 1201 Third Avenue, Suite 4900  
 25 Seattle, Washington 98101-3099  
 26 Phone: 206.359.8000  
 Fax: 206.359.9000

27 Lambda Legal Defense and  
 28 Education Fund, Inc.  
 29 120 Wall Street, 19th Floor  
 30 New York, NY. 10005-3919  
 31 Telephone: 212-809-8585

32 Human Rights Campaign  
 33 Foundation  
 34 1640 Rhode Island Avenue NW  
 35 Washington, D.C. 20036  
 36 Telephone: (202) 568-5762

1 E-mail: [Cynthia.Weaver@hrc.org](mailto:Cynthia.Weaver@hrc.org)  
2 E-mail: [Ami.Patel@hrc.org](mailto:Ami.Patel@hrc.org)

3 *Attorneys for Plaintiffs*

STIPULATION TO FILE  
OVERLENGTH BRIEFS - 5  
CASE NO. 2:25-CV-241-BHS

Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, Washington 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

Lambda Legal Defense and  
Education Fund, Inc.  
120 Wall Street, 19th Floor  
New York, NY. 10005-3919  
Telephone: 212-809-8585

Human Rights Campaign  
Foundation  
1640 Rhode Island Avenue NW  
Washington, D.C. 20036  
Telephone: (202) 568-5762